

FILED

JUL 22 2020

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
v.)
QUIANNA BROWN)

Criminal No. 20-171
[UNDER SEAL]

(18 U.S.C. §§ 1349, 1040(a)(2), and 2)

INDICTMENT

The grand jury charges:

INTRODUCTION

1. At all times material to this Indictment, the United States government has been taking steps to slow the spread of the novel coronavirus (COVID-19) and to mitigate its impact on the public's health and economic well-being.
2. On March 13, 2020, the President declared the ongoing COVID-19 pandemic to be an emergency under Section 501(b) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act.
3. On March 27, 2020, the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) was signed into law. The CARES Act created the Pandemic Unemployment Assistance program, which provides unemployment benefits to individuals not eligible for regular unemployment compensation or extended unemployment benefits.
4. The Pandemic Unemployment Assistance program is administered by the various states, including the Commonwealth of Pennsylvania and the State of Michigan, but its benefits are funded in part by the federal government.
5. Only individuals who are unemployed for reasons related to the COVID-19 pandemic are eligible for Pandemic Unemployment Assistance benefits. In order to receive

benefits, an individual must file a claim including his or her name, social security number, and address, as well as answer the eligibility questions.

COUNT ONE

THE CONSPIRACY AND ITS OBJECTS

6. The allegations contained in paragraphs 1 through 5 are re-alleged as if fully set forth herein.

7. From in and around June 2020, and continuing thereafter until in and around July 2020, in the Western District of Pennsylvania and elsewhere, the defendant, QUIANNA BROWN, knowingly and willfully did conspire, combine, confederate and agree with other persons both known and unknown to the grand jury, to commit an offense against the United States, that is, mail fraud, in violation of Title 18, United States Code, Section 1341.

MANNER AND MEANS OF THE CONSPIRACY

8. It was a part of the conspiracy that members of the conspiracy, including the defendant, QUIANNA BROWN, filed fraudulent claims for Pandemic Unemployment Assistance benefits with states including the Commonwealth of Pennsylvania and the State of Michigan. These claims were fraudulent because they were not filed by, and/or on behalf of, real persons seeking Pandemic Unemployment Assistance benefits. Instead, they were filed by members of the conspiracy using names and social security numbers that were fictitious and/or that belonged to persons who had not authorized claims to be filed on their behalf.

9. It was further a part of the conspiracy that members of the conspiracy, including the defendant, QUIANNA BROWN, caused a Post Office Box to be rented at the United States Post Office in Coal Center, Pennsylvania, and further caused the Pandemic Unemployment Assistance benefits granted as a result of the fraudulent claims to be sent to that address via the United States mail.

All in violation of Title 18, United States Code, Section 1349.

COUNTS TWO – FOUR

The grand jury further charges:

10. The allegations contained in paragraphs 1 through 5 are re-alleged as if fully set forth herein.

11. From on or about June 7, 2020, and continuing thereafter to on or about June 24, 2020, in the Western District of Pennsylvania and elsewhere, the defendant, QUIANNA BROWN, made and caused to be made materially false, fictitious, and fraudulent statements and representations, to wit: the defendant, without authorization, filed and caused to be filed claims with the Commonwealth of Pennsylvania for Pandemic Unemployment Assistance benefits in the names of individuals who, as she well knew, did not actually intend to file claims for those benefits.

12. The defendant, QUIANNA BROWN, knew that the statements and representations in the claims were material.

13. Said statements occurred in a matter involving a benefit, to wit: money that was paid in connection with the COVID-19 pandemic, which has been declared as an emergency under Section 501(b) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act.

14. The payment of the above described benefits was transported via the United States mail.

15. On or about the following dates, each such date being a separate count of this Indictment, the defendant, QUIANNA BROWN, filed and caused to be filed false and fictitious claims in the names of the following individuals:

Count	Date	Purported Claimant
Two	June 19, 2020	J.J.
Three	June 19, 2020	L.J.
Four	June 19, 2020	T.J.

All in violation of Title 18, United States Code, Sections 1040(a)(2) and 2.

CRIMINAL FORFEITURE ALLEGATIONS

16. The grand jury re-alleges and incorporates by reference the allegations contained in Count One of this Indictment for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

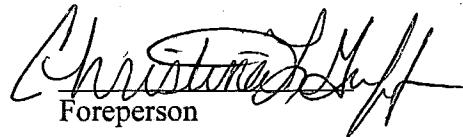
17. The United States hereby gives notice to the defendant, QUIANNA BROWN, charged in Count One of this Indictment, that upon her conviction of such offense, the United States will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property constituting or derived from proceeds obtained directly or indirectly as a result of such offense, including but not limited to the following: any Pandemic Unemployment Assistance benefits seized on or about July 2, 2020 and July 13, 2020.

18. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property described in this forfeiture allegation.

A True Bill,



Christina M. Huff
Foreperson



SCOTT W. BRADY

United States Attorney
PA ID No. 88352